

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RUTH SMITH, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SUNPATH, LTD., a Massachusetts corporation,

Defendant.

Case No. 1:22-cv-00081-LMB-WEF

PLAINTIFF’S WITNESS LIST

Pursuant to Fed. R. Civ. P. 26 and the Court’s Scheduling Order, Plaintiff Ruth Smith (“Plaintiff”), by and through her counsel, respectfully submits her witness list. Included are names of witnesses who Plaintiff expects to call and names of witnesses who Plaintiff may call if the need arises:

Expect to call:

- Plaintiff Ruth Smith
- SunPath, Ltd. representative
Andrew Garcia, president of SunPath
- Chukran Management Group, LLC’s d/b/a American Protection Corp. representative
Kobi Chukran (by deposition)
10627 Cocobolo Way
Boynton Beach, Florida 33437
- Serge D. Jorgensen, Sylint Group
240 N. Washington Blvd. 6th Floor
Sarasota, Florida 34236

May call:

- Five9, Inc. corporate representative

Dated: December 14, 2022

RUTH SMITH, individually and on behalf of all
others similarly situated,

By: /s/ Francis J. Driscoll, Jr.
One of Plaintiff's Attorneys

Francis J. Driscoll, Jr.
(frank@driscolllawoffice.com)
4669 South Blvd., Suite 107
Virginia Beach, VA 23452
Telephone: 757-321-0054
Facsimile: 757-321-4020

Patrick H. Peluso
ppeluso@woodrowpeluso.com
Woodrow & Peluso, LLC
3900 East Mexico Ave., Suite 300
Denver, Colorado 80210
Telephone: (720) 213-0675
Facsimile: (303) 927-0809

Attorneys for Plaintiff and the Classes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on December 14, 2022.

/s/ Francis J. Driscoll, Jr.